



Jeffrey L. Barger
Vice President
Pipeline Operations

Dominion Transmission, Inc.
445 West Main Street, Clarksburg, WV 26301-2450

Mailing Address: P.O. Box 2450
Clarksburg, WV 26302-2450

CERTIFIED MAIL

June 29, 2011

Mr. Byron Coy, Jr.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Mountain View Office Park
820 Bear Tavern Road, Suite 306
West Trenton, NJ 08628

RE: CPF 1-2011-1011

Dear Mr. Coy:

This letter is the formal response by Dominion Transmission, Inc. (DTI) to the Notice of Probable Violation dated May 31, 2011 (received by DTI June 2, 2011) stating:

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

1. § 192.195 Protection against accidental overpressuring.

(a) *General requirements.* Except as provided in §192.197, each pipeline that is connected to a gas source so that the maximum allowable operating pressure could be exceeded as the result of pressure control failure or of some other type of failure, must have pressure relieving or pressure limiting devices that meet the requirements of §192.199 and §192.201.

Mr. Byron Coy, Jr.
Re: CPF 1-2011-1011
June 29, 2011
Page 2 of 2

Dominion Transmission, Inc. (DTI) failed to ensure that each pipeline that was connected to a gas source, for which the maximum allowable operating pressure could be exceeded as the result of pressure control failure or of some other type of failure, had a pressure relieving or pressure limiting device that met the requirements of §192.199 and §192.201.

The maximum allowable operating pressure (MAOP) in the Woodhull Storage field (MAOP of 2,160 psig) was above the MAOP of the downstream pipeline system fed by three pipelines. Two of the three pipelines had an MAOP of 1,000 psig, and one had an MAOP of 1,200 psig. These pipelines were used when moving gas from the storage field facility to market. There was not any additional over pressure relieving or pressure limiting device installed on the pipeline downstream of the storage field that would prevent an accidental over-pressurization to that pipeline system when the gas was flowing out of the storage field and bypassing the compressor station compressor engines.

Evidence of the probable violation is based on the DTI Woodhull PEG diagram given to the NYSDPS inspector that shows compressor station schematic facilities, and follow-up communications with DTI representatives.

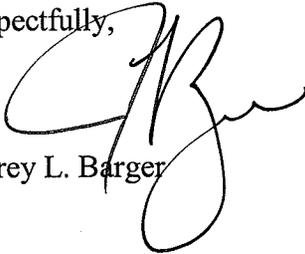
DTI Response:

DTI does not contest the findings of the Notice.

To address the concerns raised in the Notice, DTI has installed additional devices to provide overpressure protection during withdrawal at its Woodhull Storage Field. Upon identification of this issue during the NYSDPS Inspection (June 15-16, 2010), DTI evaluated the requirements, and designed an appropriate protection scheme. On December 28, 2010, installation of a new regulator and relief valve (sized to relieve the full capacity of the regulator) was completed. The installation of these devices satisfies the requirements of §192.195.

If you have any questions or should require additional information, please do not hesitate to contact Shawn Miller at (304) 627-3404.

Respectfully,



Jeffrey L. Barger